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SUPERFUND RECORDS

Abex Corp.  
MOD031003767  
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#140076

CDM FEDERAL PROGRAMS CORPORATION

April 5, 1993

Dr. Peter Culver, P.E.  
U. S. Environmental Protection Agency  
Region VII, Superfund Branch  
726 Minnesota Avenue  
Kansas City, Kansas 66101

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Project: ARCS Regions VI, VII, & VIII Contract No. 68-W9-0021  
Work Assignment No. 024-7JZZ  
DCN: 7760-024-A8-RT-CPKG  
Subject: Status of File Review and SIP Recommendations for the Abex Corporation CERCLIS  
ID No. MOD031003767

Dear Dr. Culver:

CDM Federal Programs Corporation (CDM Federal) was tasked under Work Assignment 024-7JZZ to complete a Site Inspection Prioritization (SIP) of the Abex Corporation site. The SIP assignment consists of a preliminary file review and the evaluation of the information and data which currently exist in the file. Recommendations are then made addressing site assessment deficiencies if they exist. These deficiencies are addressed by Phases I, II, and III of the SIP process. Not all phases may be required. The Abex Corporation site is located at 6600 Ridge Avenue, Wellston, Missouri (Figures 1 and 2). Several activities have occurred at the site since 1980. The following is a brief summary of those activities:

July 1980

On July 31, 1980, EPA Region VII received the first notification of hazardous waste activity at this site pursuant to Section 3010 of the Resource Conservation and Recovery Act. The types of hazardous waste activity noted were generation and treatment/storage/disposal of the following wastes:

- Hazardous waste from nonspecific sources: F012
- Hazardous waste from specific sources: K061
- Commercial chemical product hazardous waste: P064
- Nonlisted hazardous waste: Ignitable, Corrosive, and Toxic

October 1980

On October 9, 1980, EPA sent the acknowledgement of notification of hazardous waste activity and assigned EPA ID No. MOD031003767.

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### November 1980

On November 17, 1980, EPA received a Part A Application for Storage in a Waste Pile for disposal in a landfill and for treatment in a tank. This application listed the following seven hazardous wastes, their generation rates, and how they were being stored, treated and/or disposed:

- F012: 124 tons/yr - tank treatment - waste pile - landfill
- K061: 35 tons/yr - waste pile - landfill
- D004: 20 tons/yr - waste pile - landfill
- D006: 20 tons/yr - waste pile - landfill
- D007: 511 tons/yr - waste pile - landfill
- D008: 173,457 tons/yr - waste pile - landfill
- D008: 624 tons/yr - tank treatment - waste pile - landfill

The attachments to this application, however, stated that all of the above seven wastes taken to the landfill area onsite would be eventually disposed at an offsite location.

### January 1981

On January 8, 1981, Abex informed EPA that this site did not generate F012 and K061 wastes as per the amended regulations 40 CFR 261.31 and 40 CFR 261.32 (Federal Register of November 12, 1980, Vol. 45, No. 220). With the amendments, the F012 listed waste was identified as "quenching wastewater treatment sludges from metal heat-treating operations where cyanides are used in the process." K061 was identified as "Emission control dust/sludge from the primary production of steel in electric furnaces." In this letter, Abex reported that the heat treatment operations at the plant did not involve any cyanide-containing quench water and that this plant was a secondary steel foundry.

### August 1981

On August 6, 1981, an RCRA Compliance Inspection was conducted by Missouri Department of Natural Resources personnel. The inspection report was sent to the facility on September 24, 1981.

### May 1982

On May 17, 1982, EPA sent a letter to this facility advising that its Part A Permit Application was incomplete with respect to process code and appropriate unit of measure. This letter requested a response by June 4, 1982.

On May 27, 1982, EPA sent a letter to this facility regarding two amendments to RCRA pertaining to:

- Closure and Post Closure Assurances
- Liability Assurances

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This letter required the facility to submit appropriate documentation by July 6, 1982, for the Closure and Post Closure Assurance, and by July 15, 1982, for the liability coverage for sudden accidents.

#### September 1982

On September 13, 1982, Mr. A. Walker Bingham, General Attorney for Abex sent a letter to EPA stating that independent analyses performed on the wastes subsequent to filing of the Part A Application demonstrated that the wastes were not hazardous. Hence, Mr. Bingham contended that TSD status was not appropriate for this facility. He further advised that the facility was no longer in operation and requested withdrawal of the Part A Permit Application.

#### November 1982

On November 19, 1982, Mr. Bingham petitioned EPA for a response to his earlier letter dated September 13, 1982.

#### January 1983

On January 24, 1983, EPA responded to Mr. Bingham's letters and requested the company to submit the following information pursuant to Section 3007 of RCRA:

- Analytical results for tests performed during 1980.
- An explanation of why the P064 waste identified in the original notification was not included in the Part A Permit Application.
- A detailed description of the current operational status of the facility.

#### February 1983

On February 7, 1983, Mr. Charles Borcharding, Director, Environmental Control sent a response to the inquiry from EPA.

#### August 1984

On August 16, 1984, a Preliminary Assessment (PA) of the Abex Corporation was initiated by the Missouri Department of Natural Resources (MDNR). The following conclusions and recommendations were made in August of 1984 based on information obtained during the PA investigation.

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#### PA CONCLUSIONS:

This site, in its present condition, does not pose a significant threat to public health or the environment and should be assigned a low priority for further investigation. This conclusion is based upon the following considerations:

- The amount of waste material in the sand dump area appeared to be minimal.
- A good growth of vegetation was observed on the sand dump area. No vegetative stress was observed at the site.
- No landfilling operation was performed at the site.
- Due to the conflicting analytical data, it is uncertain at the present time whether the company-generated hazardous waste at this site.

#### PA RECOMMENDATIONS:

Further agency action may require sampling of the sand dump area which would aid in determination of the presence or absence of hazardous wastes at this location. At present, it is uncertain whether Abex Corporation generated any hazardous wastes at this site due to conflicting data from two independent laboratories. It should be noted, however, that Abex Corporation may perform this sampling voluntarily if formally requested to do so by MDNR/EPA.

#### October 1986

On October 22, 1986, REACT (Ryckmans Emergency Action & Consulting Team) entered into a contract with Abex Corporation to implement the following:

- Conduct a site inspection of the property located at 6600 Ridge Avenue, Wellston, Missouri, to assess the compliance status of the facility.
- Produce an engineering evaluation report and preliminary corrective action options.
- Provide a preliminary scope for additional services and/or needed corrective action.

#### November 1986

On Tuesday, November 4, 1986, REACT performed an onsite inspection of the Abex plant located at 6600 Ridge Avenue in Wellston, Missouri. The following six recommendations were made as a result of this inspection:

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- Fine dust in the manufacturing building should be sampled to verify that the material is not subject to disposal as a hazardous waste.
- Various sumps having oil/water mixture should be analyzed for presence of PCBs, RCRA heavy metals, corrosivity, reactivity, phenols, pH, and flash point (per disposal facility and MDNR. Following analysis, liquids should be separated and disposed of in an appropriate manner.
- Various drums/pails should be sampled and materials disposed of in an appropriate manner.
- The landfill area, located in the rear southwest corner of the property, should be investigated for the presence of contaminated materials (fines and/or oil). If contamination is detected, the materials should be excavated and disposed of in an appropriate manner.
- The insulation in the office building and boiler room should be sampled and analyzed for asbestos content.
- Underground tanks should be registered with MDNR and investigated to determine if they present any environmental liabilities.

In response to REACT's recommendations, REACT was authorized to perform sampling for ultimate disposal of drums and containers located within the Abex facility and drums in the landfill area. The following list of activities were performed by REACT:

- Plant Building and Materials Sampling (November 11, 1986)

The plant buildings were inspected and 83 drums, buckets, and pails containing materials were collected and staged in the shipping building. Containers were given sequential numbers and samples were collected for analysis. A large number of surface containers, in various stages of burial, were observed in the landfill area.

Samples of the oil and water in the pits inside and outside the machine shop and other storage tanks were collected for analysis.

Samples from accessible underground tanks were collected and appeared to be pure petroleum product with no visible water. These samples were not analyzed.

- Staging of Landfill Drums (November 20, 1986)

The landfill contained 61 containers visible from the surface which were loaded or winched to the asphalt drive. To minimize the possibility of tracking contamination, equipment was staged and washed on the asphalt drive before being moved to the shipping building. This allowed equipment and personnel to be decontaminated of possible wastes before movement was made to other parts of the complex.

- Sampling of Remaining Materials (December 5, 1986)

The above 61 containers were sampled and catalogued for further analysis.

- Disposal of Empty Containers (December 5, 1986)

Forty-eight empty containers were loaded and disposed of at West County Disposal, P. O. Box 428, Valley Park, Missouri, 63088.

- Initial Disposal of Solid Materials (December 17-18, 1986)

After review of manufacturing material safety data sheets and lab analyses, an additional 50 containers of various materials were disposed of at West County Disposal.

- Removal of Water and Oil from Pits (December 21, 1986)

The oil layer was removed by using Type 151 sorbent pads and placed in double 4-mil plastic bags. After review of lab analyses, Bernard Rains, Manager of Industrial Pollution Control, St. Louis Metropolitan Sewer District, approved disposal of the remaining water at the Bissell Point Plant. The waste sorbent was solidified on January 6-7, 1987, and was approved for disposal by MDNR on February 18, 1987, and was disposed of as a special waste solid at West County Disposal on March 10, 1987.

- Remaining Materials Stored (December 18, 1986)

Various materials pending identification and disposal were loaded onto a 40-foot trailer for secure storage and subsequent transport.

- Liquid Loading for Disposal (January 23, 1987)

Once approved for disposal, the remaining materials were loaded for transport to disposal facilities as follows:

- Sixteen containers of various petroleum products were combined to make eight drums which were reclaimed by Kiesel Oil, 4801 Filer, St. Louis, Missouri.

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- Van Waters and Rogers, 8925 Seeger Industrial Drive, Berkeley, Missouri, a registered hazardous waste storage facility, approved storage of 4 drums of hazardous waste at their facility until ultimate disposal is completed. These drums contained a variety of wastes including paint solids, flammable solids, liquids, and corrosives.

Twelve containers were combined into 2 drums and were incinerated on February 3, 1987, at McKesson Envirosystems, a division of Van Waters and Rogers.

Two drums were awaiting shipment for Ensco, 1015 Louisiana Street, Little Rock, Arkansas, for incineration at this time.

Because of no market resale, 6 containers of the original product containing two kinds of paint and roofing patch were given away.

Eight remaining drums of a hard, tar-like substance are pending written approval by MDNR as a special waste. Lab analysis confirmed these materials as nonhazardous.

- **Discrepancy in Storage Requirements (December 22, 1986)**

After an initial verbal approval to store the remaining wastes at a second corporate site in St. Louis, the MDNR refused to issue a written statement. The MDNR also ruled the wastes could not be moved to any site except an approved hazardous waste storage facility. All local storage facilities refused to accept the waste. Van Waters and Rogers agreed to store any wastes once lab analyses were reviewed and the waste was approved for disposal at one of their disposal facilities.

### **March 1987**

On March 6, 1987, a Remedial Action Report for the site was completed by REACT, St. Louis, Missouri. This report is on file at the MDNR, SLRO, and Waste Management Program (WMP), Jefferson City office. The report delineates action conducted by REACT as directed by Abex to assess the compliance status of the site and remove various materials from the site. The action consisted of testing for hazardous waste at specific locations at the site. According to REACT, no hazardous materials contamination was detected. Four drums of products used in the production process and a large amount of solid wastes were properly disposed of during the action. REACT did not conduct a subsurface, groundwater, or underground tank investigation during this action.

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### June 1988

The Region VII EPA tasked the Ecology and Environment, Inc., Field Investigation Team (E&E/FIT) through Technical Directive Document (TDD) No. F-0-7-8804-040 to conduct a PA re-evaluation of the Abex Corporation site, located in Wellston, Missouri.

It was their recommendation at the time that the present status and condition of the facility be determined and that samples be collected from the sand dump to determine if any contamination exists. All work on this site could be conducted on a low to medium priority (SI) basis.

### August 1989

On August 15, 1989, a Closure Report for 7 underground storage tanks at the site was completed by REACT. According to REACT, the tanks were removed in accordance with state and federal regulations.

On August 17, 1989, a Hydrogeologic Report on the site was completed by Ms. Mimi Garstang, MDNR, Division of Geology and Land Survey.

### March 1990

On March 12, 1990, sampling at the site was completed by the MDNR, Laboratory Services Program (LSP). The report was completed on May 30, 1990. A total of 5 water samples, 7 soil samples, and 1 sediment sample was collected at the site. The results of the sampling were included in an August 1990 site investigation report.

### August 1990

On August 27, 1990, an SI report was assembled from previous file information and data obtained during a March 1990 sampling at Abex Corporations, St. Louis, facility. After a review of all available information, it was concluded that pathway assessment and targets of any contamination at this site are very limited. Further Superfund action by MDNR at this time seems unwarranted. However, the Missouri Department of Health needs to determine if PCB and total metals contamination at the site poses a threat to persons using the site in the future. In addition, the MDNR and Metropolitan Sewer District (MSD) need to pursue the sources of the solvent contaminants in the sewer sediment which cannot be traced to the site from the sample analysis provided. The MSD may also want to pursue Abex to reduce PCB contamination into its sewer system.

### September 1990

A Potential Hazardous Waste Site Tentative Disposition Form was filed on September 6, 1990, by MDNR. This form presented final requirements needed to achieve a final disposition. Further information needs at this site include a review of data and toxicological information to determine if lead levels onsite require immediate attention.

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**Recommendations**

The Abex Corporation site is recommended to proceed to Phase II of the SIP process. Though HRS scoring of the site was accomplished by MDNR, CDM Federal feels that further assessment under the current HRS model is warranted to truly assess potential contamination at the site. HRS scoring results, utilizing the SI scoresheets and PREscore, will be the basis for determining further action at Abex Corporation. The site file contains the required information to complete Phase II.

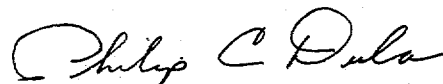
Should you have any questions regarding this site, please feel free to contact me at (913) 492-8181.

Sincerely,

CDM FEDERAL PROGRAMS CORPORATION



Robbie L. Parsons  
Site Manager



Philip C. Dula, P.G.  
Project Manager

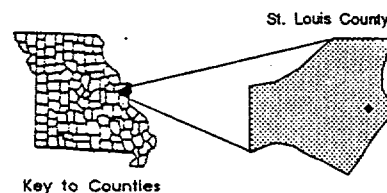
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ABEX.SIP



Scale  
0 2000 4000 Feet

Source: USGS 7.5' Topographic Quadrangle. Clayton, Mo. 1974



Project No.:  
7760-024

ABEX Corporation  
Wellston, Missouri



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Site Location Map

Figure No.:

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